

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

JAVIER RODRIGUEZ	§
<i>Plaintiff</i>	§
	§
V.	§ Cause No. 3:18-cv-00088-E-BH
	§
TARLAND, L.L.C., THOMAS MCGILL,	§
and TARA RUBSAMEN,	§
<i>Defendants</i>	§

**DEFENDANT TARA RUBSAMEN'S MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Defendant Tara Rubsamens (“Rubsamen”), who files her Motion for Summary Judgment and Brief in Support, seeking dismissal of Plaintiff Javier Rodriguez’ claim because Rubsamens is not an Employer under the Fair Labor Standard Act (“FLSA”).

**SCHEEF & STONE, LLP**

*/s/ T. Chase Garrett*

**T. Chase Garrett**  
Texas Bar No. 24075380  
[Chase.garrett@solidcounsel.com](mailto:Chase.garrett@solidcounsel.com)  
**Jonathan Strain**  
Texas Bar No. 24070689  
[jon.strain@solidcounsel.com](mailto:jon.strain@solidcounsel.com)  
2600 Network Blvd., Suite 400  
Frisco, Texas 75034  
(214) 472-2100 – Telephone  
(214) 472-2150 – Facsimile

and

**Bryan Haynes**  
Texas Bar No. 09283520  
[bryan.haynes@solidcounsel.com](mailto:bryan.haynes@solidcounsel.com)  
Scheef & Stone, L.L.P.  
500 N. Akard, Suite 2700  
Dallas, Texas 75201  
(214) 706-4200 – Telephone  
(214) 706-4242 – Facsimile

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties and/or their counsel of record in accordance with Rule 5 of the Federal Rules of Civil Procedure.

/s/ *T. Chase Garrett*  
T. Chase Garrett